

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
WESTERN DIVISION**

**JAMES ELBAOR**

**PLAINTIFF**

**vs.**

**Case No. 4:13-cv-0447-JLH**

**ARKANSAS METHODIST HOSPITAL CORPORATION  
D/B/A ARKANSAS METHODIST MEDICAL CENTER**

**DEFENDANT**

**RESPONSE TO DEFENDANT'S MOTION TO COMPEL**

Comes Plaintiff, by and through his attorneys, Denise Reid Hoggard; Rainwater, Holt and Sexton, P.A., and for his Supplemental Responses to Defendant's Motion to Compel, states:

1. Plaintiff filed their original Responses to Interrogatories and Requests for Production together with documents Bates stamped "James Elbaor 1-183."
2. On this date, Plaintiff supplemented their discovery responses to Defendants with documents with regards to Plaintiff's financial records Bates stamped "James Elbaor 184-278." Additional information has been requested through his certified public accountant from the Internal Revenue Service and will be supplemented upon receipt.
3. Plaintiff has produced additional documents relating to administrative actions regarding his professional licenses stamped "James Elbaor 342-423."
4. Plaintiff has produced additional documents regarding his continuing search for jobs in mitigation of his damages Bates stamped "James Elbaor 279-341."
5. Plaintiff has otherwise supplemented his responses and complied with the discovery requirements.

For the foregoing reasons, Defendants request this Court deny Plaintiffs' Motion to Compel and for all other relief to which they may be entitled.

Respectfully submitted,

BY: /s/ Denise Reid Hoggard  
DENISE REID HOGGARD, Bar No. 84072  
Rainwater, Holt & Sexton, P.A.  
P.O. Box 17250  
Little Rock, Arkansas 72222  
(501) 868-2500  
(501) 868-2525 (Fax)  
[hoggard@rainfirm.com](mailto:hoggard@rainfirm.com)

**Attorney for Plaintiff**

**CERTIFICATE OF SERVICE**

I, Denise Reid Hoggard, do hereby certify that a true and correct copy of the above and foregoing pleading has been served upon all parties of record, via electronic mail, on this 21<sup>st</sup> day of November, 2014:

Kimberly Coats  
Littler Mendelson, P.C.  
217 E. Dickson Street, Suite 204  
Fayetteville, AR 72701  
[KCoats@littler.com](mailto:KCoats@littler.com)

/s/ Denise Reid Hoggard  
Denise Reid Hoggard